BELLSOUTH

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September 15, 1999 **RECEIVED**

EX PARTE

Ms. Magalie Roman Salas,
 Secretary
Federal Communications Commission
The Portals - 445 12ᵗʰ Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 98-121

Dear Ms. Salas:

On September 15, 1999, William Stacy and I, representing BellSouth, spoke with Commission staff to answer questions posed by the staff about scope of the revised Third-Party OSS Testing plan adopted by the Georgia Public Service Commission. FCC staff members participating in the call were Michelle Carey, Andrea Kearney, William Agee, John Stanley, Bill Hill, Hugh Boyle, Peter Young, Bob Hood and Daniel Shiman of the Common Carrier Bureau.

During the call Mr. Stacy described the Georgia PSC proceedings relating to the OSS testing and answered questions relating to the test plan, including questions relating to the KPMG status report on OSS Testing Evaluation, as filed with the Georgia Commission on September 10, 1999, a copy of which is attached hereto. He also answered questions on data collection and processing and the Louisiana audit of performance measurement data.

In accordance with Section 1.1206, I am filing two copies of this notice in the proceeding identified above and request that you associate this notice with the record in that proceeding.

Sincerely,

David G. Frolio

Attachment
cc: Michelle Carey
      William Agee
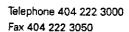   Andrea Kearney
      John Stanley
      Bill Hill
      Hugh Boyle
      Pete Young
      Bob Hood
      Daniel Shiman

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September 10, 1999

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW
Atlanta, GA 30334

Dear Ms. O'Leary:

BellSouth OSS Testing Engagement - Status Report

Enclosed please find an original and twenty-six (26) copies, as well as an electronic version, of KPMG's *BellSouth OSS Testing – Status Report*, dated September 10, 1999. These documents are provided for official filing with the Georgia Public Service Commission.

Also enclosed please find KPMG's signed Certificate of Service, dated September 10, 1999.

Please contact me if you require additional materials or information. Thank you.
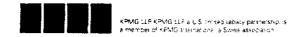
Very truly yours,

KPMG LLP

David Frey
Manager

DF:btr

Enclosures

■■■■
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1.0 Document Objective

In this document, KPMG provides a summary status report on developments related to the BellSouth OSS Testing Project. A brief overview of key developments is provided in section 2.0. A more detailed report on specific test items is provided in the table in section 4.0. Each item presented in the table in section 4.0 includes a reference number that identifies the item in previous or future status reports.

2.0 Key Developments

Assignment of Responsibilities

BellSouth, Hewlett-Packard (HP), and KPMG have jointly agreed to a change in the assignment of responsibilities in the testing process. A letter signed by the three parties that outlines the change in responsibilities has been sent to the Georgia Commission for their approval. The responsibilities outlined in the letter are as follows:

1. KPMG will be assigned the responsibilities of Test Manager in addition to the Firm B auditor role they are now fulfilling. These responsibilities will include:

    a. Preparation and approval of the specific test plans for each of the test domains, including Pre-ordering, Ordering and Provisioning, Billing, Maintenance and Repair, Forecasting and Change Management, as well as all volume testing associated with each of these domains, consistent with the Commission's May 20, 1999 Order and the Master Test Plan.

    b. Preparation of Local Service Request data, pre-ordering data, billing data, or any similar data required to execute the test plans described in (a).

    c. Direction of the execution of the test plans, reporting of results, and preparation of the final report for the Commission.

2. KPMG will independently monitor the test by managing the test as an independent third party.

3. HP will be assigned the responsibilities of preparing the Testing Infrastructure which includes (a) preparing interfaces to conduct the test plans developed by KPMG, (b) transmitting and receiving the test data, and (c) collecting and reporting the results to KPMG.

4. HP will further provide professional services as required under the direction of KPMG both to help facilitate a smooth transition of responsibility, and to most effectively leverage HP's assets and expertise in the OSS testing arena.

5. KPMG will maintain the original Firm B responsibilities assigned by the Commission, including evaluation of the transactional and operational testing, comparison of the testing results to those reported by BellSouth's OSS reporting systems, and the audit of BellSouth's Percent Flow-Through Service Requests.

6. The scope and detail of the testing will be as described in the Master Test Plan as updated August 20, 1999 or as further clarified by approval of KPMG as Test Manager.

This assignment of responsibilities will place KPMG and HP in roles similar to the roles these firms were assigned during the recently concluded test conducted by the NY-PUC of Bell Atlantic's OSS.

Transition Activities
Following the September 2, 1999 meeting to discuss transition of test manager responsibilities, KPMG test leads met with the HP test manager to review the status of the test plans for each evaluation area. Meetings were held to discuss the current status of the pre-test and test activities associated with the billing, pre-order, order & provisioning, maintenance & repair, change management, and volume test areas. Metrics evaluation approaches were discussed within the context of the functional test areas. The technology infrastructure developed and implemented by HP was also reviewed.

KPMG and HP are working in a cooperative manner to transfer work product and knowledge from the HP teams to newly formed KPMG teams. KPMG is currently assessing the usefulness of pre-test work product produced by HP in each of the functional test evaluation areas. KPMG is considering implementation of a front-end test management tool utilized in the New York and Pennsylvania tests.

KPMG submitted a transition plan to BST on September 8, 1999 detailing the activities KPMG and HP will jointly undertake to ensure an effective transition of the test manager role.

Test Developments
*   Master Test Plan (MTP). A revised MTP was filed with the Georgia Public Service Commission on August 20, 1999.

*   EDI Interface Testing. EDI-PC Testing has completed and the interface is being used for submission of service orders against the billing test bed. Testing for EDI LAN-to-LAN, an interface to be used for order functional testing, is in progress.

*   TAG Interface Testing. The first two phases of connectivity and application testing have completed. Pre-order validity testing is in progress and expected to complete by September 13, 1999. Order validity testing will commence once EDI testing is complete.

- RSIMMS (Volume Testing System) Environment Audit. KPMG has requested detailed information on both the RSIMMS and the production environments for comparison purposes. KPMG has suggested execution of a limited capacity test against the production environment. BellSouth has agreed and issued a change request for the MTP.

- Billing. On Monday, August 30, KPMG received a draft of the detailed test plans for the Invoicing and Daily Usage Feed Functional Tests (BLG-1, BLG-2). Following a joint test plan walk through by KPMG and HP, KPMG agreed that HP could proceed with submission of service orders. These submissions were subsequently initiated via EDI-PC. HP was provided with a list of considerations for inclusion in the next draft of the test plan. These considerations will be incorporated as KPMG assumes management of the test execution.

- Billing. Difficulties have arisen in the creation of the EDI-PC Billing service orders. A plan, now awaiting final concurrence, has been proposed to overcome these problems and minimize the overall impact on the test schedule.

3.0 Key Upcoming Activities

- KPMG will issue a test project schedule based on the transition activities to BellSouth during the week of September 13, 1999.

- BellSouth is scheduling training for new KPMG team members

- KPMG will issue future status reports covering all functional test areas upon achievement of the following test milestones:

  - Initiation of functional transaction testing for pre-order and order & provisioning
  - Initiation of volume testing for pre-order and order & provisioning

4.0 Specific Item Status

Ref*	Item	Status	Issues	Next Step/Resolution
I-1	Master Test Plan (MTP) Revisions	• A revised MTP was filed with the Commission on 8/20/99.	• KPMG is currently reviewing MTP in new role as Test Manager. • Flow-Through Audit description is being revised.	• KPMG will provide proposed revisions by 9/17/99.
I-2	Test bed development	• HP provided BST with an initial count of the number of facilities that need to be available for testing and the number of facilities that need to be provisioned before the start of testing. KPMG is reviewing and revising these requirements.	• HP's request excluded the number of facilities that need to be provisioned as CLEC accounts at the start of the test.	• KPMG is conducting a test bed requirements analysis and will provide test bed specifications to BST by mid-September.
		• BST has provided a summary of functional testing constraints based on the number of orders that will require manual processing and the number that are carried through to provisioning.	• BST transaction processing constraints could result in extension of the transaction test schedule	• KPMG is developing test cases for each UNE scenario in the MTP. • Based on the number and diversity of these test cases, KPMG will determine the number of instances to run against each test case. This data will be used to develop the test bed specifications and to arrive at a total number of planned test transactions.
I-6	EDI functional testing	• EDI-PC interface testing completed on 9/2/99. This interface is being used for submission of LSRs used to establish accounts for the billing evaluation. Transactions sent through this interface are not part of the order functional transaction evaluations.	• None.	• N/A

Ref*	Item	Status	Issues	Next Step/Resolution
		• A Test Agreement for EDI LAN-to-LAN interface testing has been negotiated. The first two phases of testing, Connectivity and Syntax, have completed. End-to-end testing did not complete as scheduled on 9/3/99. • Eleven (11) of 20 end-to-end test cases have been successfully submitted.	• An addendum to the Test Agreement will be negotiated since end-to-end testing did not complete as initially scheduled. • One of the scenarios (REQ Type A, ACT Type T) planned for interface testing is not currently supported by BST's EDI interface.	• BST is in the process of validating the remaining end-to-end test cases. • An addendum to the Test Agreement will be developed, if necessary. • A software fix is scheduled to be implemented on 10/8/99 to allow this order type to be processed via EDI.

Ref*	Item	Status	Issues	Next Step/Resolution
I-7	TAG functional testing	• A Test Agreement for TAG interface testing has been negotiated. The first two phases of testing, Connectivity and Application, have completed. Validity testing for pre-order transactions did not complete as scheduled on 9/3/99. • HP expects pre-order Validity testing to complete by 9/13/99. • Order Validity testing will begin when EDI testing is complete. HP anticipates TAG interface testing will finish by 9/17/99.	• An addendum to the Test Agreement may have to be negotiated since Validity testing for pre-ordering and ordering did not complete as initially scheduled.	• HP will continue submitting pre-order Validity transactions and initiate order Validity testing. • An addendum to the Test Agreement will be developed, if necessary.
I-8	BLG-1 CRIS/CABS Invoicing Functional Test	• On 9/30/99, BST made the Billing test bed available to HP. At this time, HP's comprehensive test plan was not yet developed. KPMG asserted that LSR processing could initiate but HP would bear the risks that future test problems would be incurred.	• Considerable problems were encountered in processing the LSRs prepared by HP due to errors by both HP and BellSouth. In order to expedite the order entry and satisfy test schedule requirements, it was agreed to allow BST to assist in preparation of the LSRs, since LSR development and submission are outside the scope of the billing test targets. KPMG agreed to allow this assistance with the condition that firewalls be implemented between the HP billing and ordering teams.	• KPMG/HP billing teams will develop revised test plan and transaction schedule

Ref*	Item	Status	Issues	Next Step/Resolution
		• On 8/23/99, a BST SME team met with HP at the test site in order to address specific billing questions. The objective of this meeting was to expedite the manual submission of orders to establish the billing accounts.	• Billing questions were not received in advance by BST and, therefore, not addressed. The LSRs were populated with BST assistance; HP elected to delay submission of orders (via EDI instead of fax) until the September 5th/7th bill cycles.	• BST responded to HP's list of billing questions via email on 8/30. BLG-1 testing will begin according to HP's revised schedule. No additional action required.
		• On 8/30/99, KPMG received a draft of the detailed test plan for BLG-1 and BLG-2. Upon review, it was determined that testing could start Wednesday, September 1st, although there were a number of recommendations for additions or revisions to the plans. • HP began submitting orders via EDI-PC shortly thereafter. Due to submission errors, the targeted bill cycles of 9/5 and 9/7 were missed.	• A second draft of the detailed test plan is required and will be developed by KPMG and HP as part of the transition activities.	• KPMG to direct development of a revised detailed test plan
	Billing of LNP	• LNP scenarios cannot be implemented in the initial Billing test transactions due to intervals involved in establishing a valid NPAC registration code.	• BST has suggested that, since no LNP indications appear on a bill, requiring two bill cycles for LNP provisioned elements would unnecessarily extend the Billing test. KPMG has concurred, subject to validation of the BST claim during testing.	• KPMG will test whether LNP charges appear on bills.

Ref*	Item	Status	Issues	Next Step/Resolution
II-1	Metrics	• Reporting from the BST system for producing metrics (PMAP) is available monthly. For OSS testing purposes, KPMG/HP believe a more frequent reporting system is necessary. • BST has proposed that access to tactical raw data will be provided at more frequent intervals than PMAP for metrics comparison purposes. However, PMAP will serve as the official source of BST metrics for the Performance Results Comparison tests.	• Metrics reporting and delivery procedures need to be developed and approved prior to initiation of functional testing.	• N/A
II-2	Project Plan/Schedule	• KPMG will issue a project plan/schedule on 9/14/99.	• None.	• N/A

Ref*	Item	Status	Issues	Next Step/Resolution
II-3	Volume Test Audit	• KPMG will audit the RSIMMS environment and report on whether BST adequately copied its current production environment. • BST provided initial detailed information on the RSIMMS environment. • KPMG has suggested execution of a limited capacity test in the production environment.	• KPMG does not believe that conducting the volume test against a test system environment rather than the production system environment will satisfactorily accomplish the objectives of the volume test. KPMG understands that the GA PSC has approved conducting the volume test against a test system environment, but believes BST may open itself to criticism from interested parties, and that this approach may negatively impact BST's 271 filing. KPMG has agreed to audit the adequacy of the replication of the production system in the test environment. BST has agreed to run a capacity test in the production environment.	• KPMG will conduct several walkthroughs and invasive system reviews to audit the system.
II-4	Volume Test	• KPMG will design test cases and determine the distribution of pre-orders and orders for the volume test. • KPMG is reviewing the HP test bed requirements submitted to BST.	• None.	• BST is determining which pre-orders and orders can be reused during the test and developing a system to reset the systems to allow for greater reuse of the test bed. • KPMG will define the volumes needed for the Normal and Peak Tests, and will identify the flow-through pre-orders and orders to be tested. • BST will provide a forecasted distribution of pre-orders.

Ref*	Item	Status	Issues	Next Step/Resolution
11-5	Forecasting & Change Management	• Electronic Interface Change Control Process (EICCP) Steering Committee meeting held on 8/3/99. Next meeting, scheduled for 9/14/99, will be a follow-up meeting to update the action items status. • OSS99 Change Control Process meetings for 8/18/99, 8/25/99, and 9/8/99 were cancelled. A phone meeting was held on 9/1/99. The next weekly meeting is scheduled for 9/15/99.	• None.	• KPMG will write the formal Forecasting and Change Management test plans.
1-9	M&R Functional Testing: Connectivity	• TAFI dial-up connectivity has been established. • HP/KPMG have decided that the EC-CPM-TA client will be used as the access to ECTA. Reconfiguration to provide T-1 access should be completed by 9/15.	• Volume test interface and methodology have not been determined.	• A request has been made to BST to re-configure the T1 to access the EC-CPM-TA. • KPMG will submit a list of M&R volume-related questions to BST.

*Referencing Methodology: An Issue beginning with 1-n indicates that the issue was listed on the July 22, 1999 status report. An Issue beginning with 11-n indicates that the issue is new for this report.